

200504215123 Received PERC OSEC 04/21/2005 08:36:00 PM Docket# CP05-32-000, ET AL.

Magalie Salas
US Federal Energy Regulatory Commission
Office of the Secretary
888 1st Street NE, Room 1A
Washington, DC WA 20426

RE: Docket Nos. CP05-32-000, 001
Applicant : Northwest Pipeline Corporation

April 21, 2005

Dear Ms. Salas,

IND11-1 I recently sent a letter to Northwest Pipeline representative regarding inaccuracies in the documents I received from them. For the record, I would like to include that document under CP-05-32-000, 001, so it would be available to all interested parties.

Thank you for consideration.

Sincerely,

Julian Mart

809 238th Ave NE
Sammamish, WA 98074

tel: (425) 836-1661
fax: (425) 836-8991
e-mail: y007m@hotmail.com

Individuals

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IND11-1 Thank you for your comment. Your letter to Northwest has been placed on the public record.

View from 8th St. NE toward NE (area to the left of fence is wetland, area to the right of fence is trail)



Individuals

View from West side of pipeline easement towards the North corner of property located at 809 238th Ave NE



Individuals

Ms. Marianne Scharping
Northwest Pipeline

11120 Evergreen Way, Suite H
Everett, WA 98204

April 11, 2005

Dear Ms. Scharping,

In response to your "Offer letter" dated March 23, 2005, please find the following comments/ concerns regarding the Capacity Pipeline Replacement Project:

Most of the comments were sent to FERC on April 10, 2005, and can be viewed online. These relate specifically with: 1) temporary work area; 2) well position; 3) water availability; 4) loss of business; 5) water table; 6) water lines; 7) petroleum and hazardous material spills; 8) erosion control; 9) private road access; 10) personnel present on work site. For your convenience, a copy of this letter is attached.

Additionally I have the following concerns about market data evaluation, and other compensations for the work scheduled on my property:

11. INCOMPLETE REPORT/ OFFER

The well situated within my property is not mentioned in your report/ folder. Until the well is correctly included in the report (with all the restrictions), with specific actions that NWP will take to preserve, maintain and guarantee availability of water, the report remains incomplete, and is not up for discussion.

12. WATER POLLUTION/ DAMAGED PROPERTY AFTER CONSTRUCTION

We discussed specific concerns about the water pollution and the damage to the quality of water and to the water lines, but I did not have any feedback from NWP regarding the water availability and the damage that might occur AFTER the construction is completed. I would like to know exactly what guarantees do I have, that, within at least 1-year period after the completion of the project, NWP would repair the water lines.

Individuals

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13. MARKET DATA

- a) The market data used in your calculations is outdated. It does not refer to the current (2006) value of the property/ land. The calculation should have accurate data as of the time of construction, not the time the data was collected (2003).
- b) The properties that were found to be comparable with my property, are not actually under the same comparable factors. The size of the property is not the only factor that should be taken in consideration. As it is well known in the real estate, the location of the property is what dictates the value of the property. My property is next in line for a development and it has comparable values with the development already in place next door.

14. TRAFFIC TO/ FROM WORK SITE

NWP does not make any specification to the timeline for the work on my property. I understand that this might not be an issue for a regular owner (where the work might last for 1-2 days), but it will have a great impact on my livelihood, because it will affect me day-by-day for many months. I would like to know what would be the compensation for diem for using the site (from the 1st day of access-open the gate, to the last day-close the gate). I am specifically concern because any delays in project would create delays in my projects involving subdivision within the property.

15. COVENANT OF WELL USE

The well on my property is under a covenant with other 3 families, and is abiding the regulations set by the WA Department of Health and WA Department of Ecology, including prohibition of using and maintaining public roads within 100 ft from the well. I would like to know what is NWP's position regarding respecting the covenant, and implicitly the laws of WA state.

Until all the above concerns (15) will be addressed and satisfactory completed, the offer proposed cannot be in discussion.

I look forward for mutual cooperation.

Thank you.

Julian Mart

809 238th Ave NE
Sammamish, WA 98074

tel: (425) 836-1661

Individuals

11

6-351

Magalie R. Salas, Secretary
 US Federal Energy Regulatory Commission
 888 First Street, NE, Room 1A
 Washington, DC WA 20426

April 23, 2005

RE: Docket Nos. CP05-32-000, -001
 Applicant: Northwest Pipeline Corporation

Dear Secretary Salas,

This comment on filing is in regard to the Northwest Pipeline Corporation (NWP) "Capacity Replacement Project" folder for the Saddleback subdivision located in Sammamish WA. The folder, provided by Northwest Pipeline to two residents with pipeline easements, describes a proposed temporary work area (approx. 0.75 acres) and use of our privately owned road for access to the work area, mainline valve, and pig receiver station.

There are errors, omissions, and inconsistencies in the draft EIS with regards to my community that I would like FERC and NWP to address in the final draft.

Draft EIS errors, omissions, and inconsistencies

The Southern end of the Snohomish loop is located on Mr. Gray's property. According to the draft EIS, Northwest Pipeline is planning a mainline valve and pig receiver station here. This implies major construction, major heavy traffic during the construction period, and heavy trucks accessing this area in the future to retrieve "pig" devices. The following are draft EIS sections in error, inconsistencies with portions of the "Capacity project folder" that has been shared with us, and omissions:

Draft EIS Capacity Replacement Project Document- March 2005
 Docket Nos. CP05-32-000, -001
 FERC/EIS - 0178D

- | | |
|---------|--|
| IND12-1 | 1. <u>Table D-2, page D-30, Access Roads Associated with the Capacity Replacement Project, Milepost 1382</u>

Although NWP is proposing major environmental impact to our community, our private road, 238 th Ave NE, is not listed. Our road is paved with no sidewalks. |
| IND12-2 | 2. <u>Table D-2, page D-30, Access Roads Associated with the Capacity Replacement Project, Milepost 1382</u> |

Individuals

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IND12-1 Table D-2 in Appendix D has been revised to include 238th Avenue.

IND12-2 Table D-2 in Appendix D has been revised to include additional information on access roads associated with the Capacity Replacement Project.

- IND12-2 (cont'd) The section of table D-2 from milepost 1382 going northwest until milepost 1382.31 needs to be redone to reflect new and existing public access roads with sidewalks which would provide all Ingress/Egress. There is also a new gravel access road directly to the valve station that should be listed. They are:
- Milepost 1382, NE 8th ST, Paved-improved (in some areas), Ingress/Egress All-WTC
 - Milepost 1382, 235th Ave NE, Paved-improved, Ingress/Egress All-WTC
 - Milepost 1382, 233rd Ave NE, Paved-improved, Ingress/Egress All-WTC
 - Milepost 1382.01, accessed from 235th Ave NE, Gravel, Ingress/Egress All
 - Milepost 1382.05, NE 10th PL, Paved-improved, Ingress/Egress All
 - Milepost 1382.10, 236th Ave NE, Paved-improved, Ingress/Egress All
 - Milepost 1382.18, NE 14th ST., Paved-improved, Ingress/Egress All-WTC
- IND12-3 3. Table R-1, page R-5, Roads crossed by the Loops Associated with the Capacity Replacement Project
- Milepost 1382.21, 236th Ave NE, Paved-improved
 - Milepost 1382.23, NE 14th ST., Paved-improved
- IND12-4 4. Pages ES-15, 2-36, 4-166, 4-167, 4-168, 4-169, and 4-183
- These pages mention site-specific residential construction mitigation plans. NWP informed Mr. Mart and Mr. Gray 6 weeks before final comment on the draft EIS closes (April 25th 2005) that NWP was planning a mainline valve and pig receiving station on Mr. Grays property, that they propose to use approximately 0.75 acres for a temporary work area clear cutting 87 trees in the process, and using our private road to move heavy construction equipment and personnel to the work site. The remaining 8 residents were informed by Mr. Mart of the above details 3 weeks before final comments on the draft EIS closes because NWP representatives refused to do so. At this writing NWP representatives have not approached this community with a mitigation plan. If other viable alternatives with less environmental impact are ignored and their plan is forced upon us then there should be detailed plans in place before final approval of the EIS is made.
- IND12-5 5. Pages 2-15, 4-91, 4-99, 4-161
- Section 2.2.2 on page 2-15 mentions four pig receivers to be constructed for the Capacity Replacement Project. The statement is made, "...two of the pig receivers would be collocated with other aboveground facilities within Northwest's existing right-of-way and would not require any additional land outside the right-of-way during construction and operation." Since the pig receiver at MP 1382 on Mr. Gray's property is not called out as an exception in this paragraph, the above excerpt must apply. The above statement is inconsistent with the plans communicated to us by NWP.

Individuals

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- IND12-3 Table R-1 in Appendix R has been revised to clarify that the development roads crossed at MPs 1382.18 and 1382.10 are actually two crossings of 14th Street; however, 236th Avenue was not added to the table because the centerline of the proposed loop would not cross this road. This road would be used for access to the construction right-of-way. See also the response to comment IND12-2.
- IND12-4 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including the FERC staff's recommendation that Northwest file a Residential Area Work Plan for the Saddleback Subdivision that includes proposed construction and mitigation measures to minimize impacts on this area (see also mitigation measure number 22 in section 5.4). Section 4.8.3.1 also explains how the public can view the plan once it is filed.
- IND12-5 See the response to comment CO3-6.

IND12-5
(cont'd)

Section 4.5.1 on page 4-91 states, ..."The majority of the pig launchers/receivers and MLVs associated with the proposed loops would be collocated with other existing aboveground facilities. These facilities would require only a minor expansion in the footprint of the existing facility and would primarily affect the grassland/herbaceous cover type." Again this is inconsistent with the plan presented by NWP.

Table 4.8.1-3 on page 4-160 and note 'g' on page 4-161 mentions the pig receiver at milepost 1382 on Mr. Gray's property. Note 'g' says, "This facility would be collocated with an existing aboveground facility within the pipeline right-of-way so no additional land would be affected during construction and operation (the acreage of disturbance is included in the acreage calculations for the pipeline right-of-way); however, the facility would require an expansion of the existing facility and the permanent conversion of 0.3 acres of developed land consisting of the grassland/herbaceous vegetation cover type within the pipeline right-of-way to an industrial use (i.e. graveled and fenced)." This is again inconsistent with plans brought forth from NWP representatives, which include much more affected land and clear-cutting of 87 trees, some 70 to 80 years old.

Conclusion

The information above was included in our residence's motion to intervene request. Since I did not know if the intervenor request would appear in the public record, I included it in this comment on filing. Please forgive the redundancy since I'm not sure how this process works.

I respectfully request that the commission address these issues and require Northwest Pipeline representatives to immediately take proactive measures to address our environmental and socioeconomic impacts.

Sincerely,

Lee Geil

Lee & Mary Geil
810 238th Ave NE
Sammamish, Washington 98074
e-mail: GeilFamily@msn.com

Individuals

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6-354

Individuals

13

Magalie R. Salas, Secretary
US Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

April 23, 2005

RE: Docket Nos. CP05-32-000, -001
Applicant: Northwest Pipeline Corporation

Dear Secretary Salas,

On Tuesday April 7th 2005, We received the "Notice of Availability of the Draft Environmental Impact Statement (EIS) for the Proposed Capacity Replacement Project", dated March 1, 2005. We live in the Saddleback subdivision at 854 238th Ave NE in the city of Sammamish Washington. A copy of the draft EIS and other related documents were given to us and the other property owners in our subdivision by Mr. Julian Mart (809 238th Ave NE) who is our neighbor directly to the West of my property. The Northwest Pipeline Corporation (NWP) gas pipeline runs through Mr. Mart's property and Mr. Tim Gray's property (867 238th Ave NE) which is located to the North of Mr. Mart's.

After reviewing the EIS and related documents provided to Mr. Mart by NWP, We believe there are environmental and socioeconomic impacts to our neighborhood that are not being addressed. We would like to submit our comments to you for your review and submission into the public record.

In summary our concerns are:

- Lack of communication by NWP
- Lack of research and planning by NWP
- No residential area work plan for our subdivision
- Neighborhood safety
- Traffic
- Reduction of quality of life

1. Lack of communication by NWP

Mr. Gray informed use that on March 15th, 2005 representatives from NWP presented him with their "Capacity Replacement Project" folder describing a plan to create a temporary work area on his property for construction use. This would involve clearing approximately eighty-seven 2nd growth trees, many of which are 70 – 80 years old. NWPs proposed plan shows access to this temporary work site via our residential street (238th Ave NE). This street services 10 families that live in our neighborhood and is a PRIVATE ROAD. The families that live here collectively own our road and have the sole

IND13-1 responsibility for its upkeep and maintenance. At no time has NWP contacted us or other residents regarding use of our road for construction or other purposes. At no time has NWP or FERC notified us or the other 7 families without pipeline on our property that a work area and parking lot for construction equipment was planned for our neighborhood. The lack of communication is troubling to me. From my point of view, the NWP representatives are either ignorant of the fact that our street is owned by the families who live here and was designed for light vehicle use only or have no regard for the other residents 'who are not within 200 feet of the pipeline'. In either case this is unacceptable and should not, in my opinion, be acceptable to FERC.

2. Lack of research and planning by NWP

IND13-2 NWP seems to have overlooked that a community water well is located directly in the middle of the proposed temporary work area. Although my home is not serviced by this well it does serve 4 of the 10 families in our subdivision. What is NWP's plan for protecting the viability of this well? This is a concern of the entire community.

IND13-3 It appears to me that NWP has not explored all possible temporary work area alternatives for this particular segment of pipeline construction. We see at least 3 possible alternative work sites all within 0.25 miles from the proposed site on Mr. Gray's property. These 3 alternatives were outlined by Lee Geil in his letter to you dated April 13th 2005. The areas are all serviced by PUBLIC ROADS. They seem to be the most visible alternatives, and diagrams of the alternatives are included in this letter.

3. No residential area work plan for our subdivision

IND13-4 The draft EIS mentions a "Residential Area Work Plan for the Deer Park Subdivision". The Deer Park Subdivision is also within the Sammamish city limits. We would expect a similar plan would be required for our subdivision given the potential negative impact of a temporary work area on Mr. Gray's property and all of the construction activity that goes with it. The following are just a few of the questions that need answers:

- IND13-5
 - a) Traffic control at the intersection of our street (238th Ave NE) and NE 8th Street.
 - b) Traffic safety along our street.
 - c) Surveying of the existing road so roadbed damage can be determined after construction is complete.
 - d) Since our road is not designed for heavy construction traffic, damage to the road surface can be expected. A detailed plan for re-building and re-surfacing would be required.
- IND13-6
 - e) Mitigation plan for damage to the Saddleback well.
 - f) Mitigation plan for loss of viability of the Saddleback well due to contamination of the aquifer from construction activity.
- IND13-7
 - g) Re-planting of vegetation destroyed by construction.

Individuals

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IND13-1 See the response to comment CO4-1.

IND13-2 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with use of the proposed temporary extra workspaces on well number 752102. See also the response to comment IND2-2.

IND13-3 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision and alternatives to the proposed access road and temporary extra workspaces.

IND13-4 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including the FERC staff's recommendation that Northwest file a Residential Area Work Plan for the Saddleback Subdivision that includes proposed construction and mitigation measures to minimize impacts on this area (see also mitigation measure number 22 in section 5.4). Section 4.8.3.1 also explains how the public can view the plan once it is filed.

IND13-5 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with increased traffic in the area and measures Northwest would implement to minimize damage to 238th Avenue. Section 2.2.1 has been revised to state that Northwest would conduct repairs that are necessary to ensure that access roads would support the load of heavy equipment during construction and would repair any roads or culverts it damages during construction.

IND13-6 See the responses to comments CO4-8, IND2-14, and IND5-4.

IND13-7 See the response to comment IND5-7.

IND13-8 | 4. Neighborhood safety

We have no sidewalks in our subdivision. Visitors and residents often park on the street. A vehicle parked along the street takes up about 1/3 of the roadway width. Since traffic is strictly limited to residents and guests only, everyone simply walks in the street. What plan does NWP have to ensure the safety of our school children that walk to the Junior High School ½ mile East of our subdivision? What plan does NWP have to provide protection to our residents and guest while riding bikes, walking our dogs or just plain parking our vehicles on our private road? What is the plan for metering construction traffic through our neighborhood?

IND13-9 | 5. Traffic

Our street T's into NE 8th Street. NE 8th Street is a major thoroughfare providing access to Inglewood Jr. High, Eastlake High, Samantha Smith Elementary, and McAuliffe Elementary. As a result there is heavy traffic between 6:45 am and 9 am and again between 2 pm and 4:30 pm. What is NWP's plan to minimize traffic congestion due to construction vehicles entering and exiting our street?

IND13-10 | 6. Reduction of quality of life

Our private road and neighborhood is quiet and serene. It is a dead end street and as mentioned before, traffic is limited to residents and guests only. There are hundreds of 2nd growth trees of all kinds including some cedars that are approaching 100 years old. All properties have territorial views including many who overlook Mr. Gray's property. Cutting up to 87 of the trees on Mr. Gray's property, as NWP is proposing, for the purpose of parking heavy construction vehicles is completely inappropriate for this neighborhood.

CONCLUSIONS

IND13-11 |

In our opinion, the temporary work area that Northwest Pipeline Company is planning for our neighborhood is inappropriate and would have a negative environmental and socioeconomic impact. The company representatives, who have not contacted anyone in the neighborhood besides the two families that have the pipeline on their property, are behaving underhandedly. From the documentation we've seen so far, we don't believe that potential alternative work areas have been fully explored. FERC should require a detailed analysis of the areas we've mentioned and others that may be available that have minimal impact on established neighborhoods before the EIS is approved. This should not be a decision that is the most convenient for NWP while tromping on our wishes and property rights. We've seen no attempt by the company to work with the residents in our

Individuals

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IND13-8 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with increased traffic in the area.

IND13-9 See the response to comment IND13-8.

IND13-10 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with the loss of trees and alternatives to the proposed access road and temporary extra workspaces.

IND13-11 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision and alternatives to the proposed access road and temporary extra workspaces. See also the response to comment CO4-1.

IND13-11 | neighborhood to formulate a residential work area plan. FERC should require a detailed
(cont'd) | work area plan created and agreed upon by all parties before the EIS is approved.

Sincerely,

William and Constance Elliott
854 238th Ave. NE
Sammamish, Washington 98074
e-mail: connieelliott1@comcast.net

Cc: Mr. Don Gerend, Mayor City of Sammamish
Mr. Steve Roberge, Associate Planner, Community Development

Individuals

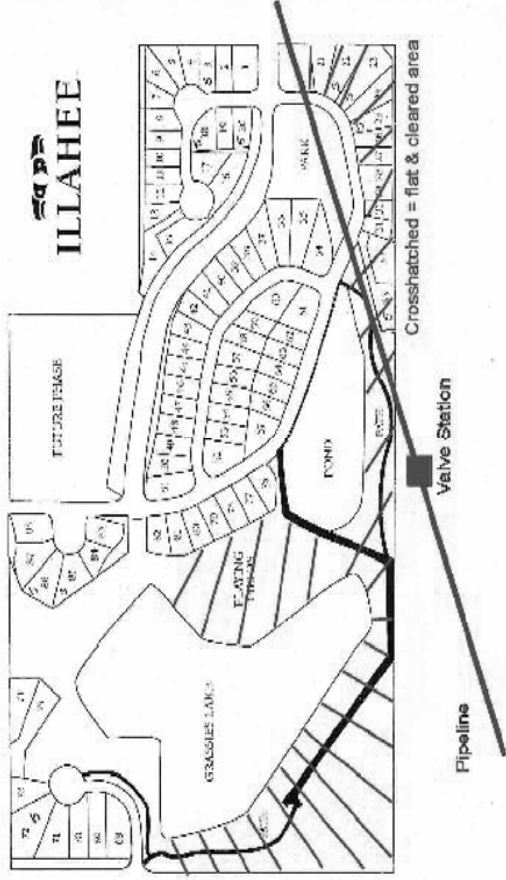


Figure 1.

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Individuals

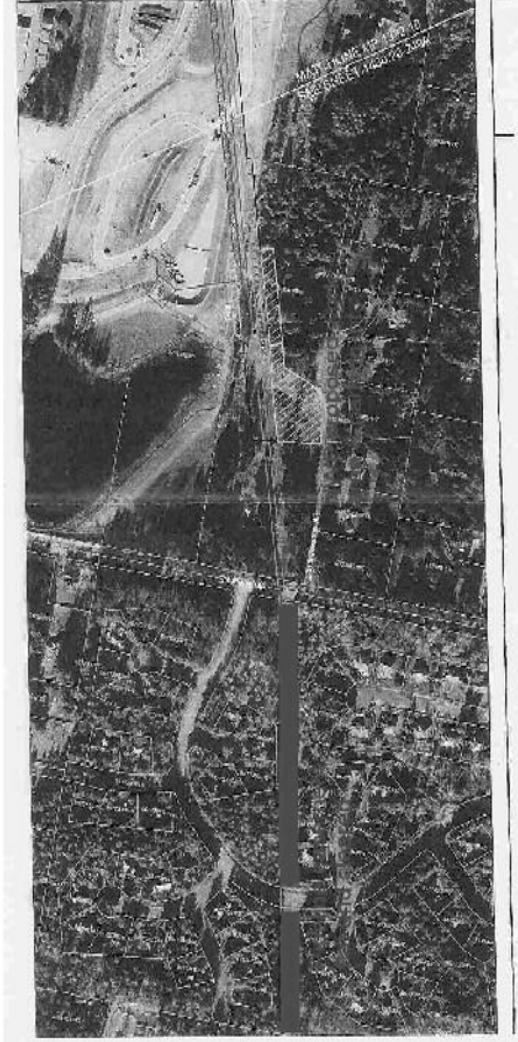


Figure 2.

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Individuals**13**

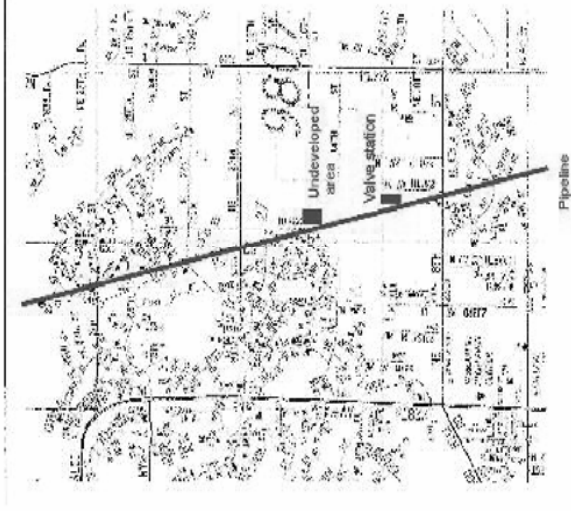


Figure 3.

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Individuals**13**

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

April 23, 2005

RE: Docket Nos. CP05-32-000, -001
Applicant: Northwest Pipeline Corporation

I am a property owner in Sammamish Washington with concerns regarding the "Capacity Replacement Project" as proposed by Northwest Pipeline Corporation.

On April 11, 2005 I submitted a Comment On Filing (Accession Number 200504125001). On April 12, 2005 I attended and spoke at a public hearing held by FERC representatives at the Redmond, Wa Marriott.

At this hearing I obtained a copy of the EIS document dated March 1, 2005. Through reading this document and subsequent discussions with NWP I have become even more concerned with and opposed to this project as it is currently proposed.

Please consider my following additional comments and concerns for the public record and your review. I have also included two photos at the end of this document.

In summary I am asking NWP & FERC to consider and answer my comments and concerns:

- Proposed Snohomish MLV/Pig Receiver & Launcher Station 1382
- Proposed Temporary Work Area At 867 238th Ave NE, Sammamish Wa
- Impacts To Our Land, Family and Community
- Potential Impacts To Our Private Community Water System
- Potential Impacts To Our Private Community Road
- Comments On The Draft EIS document dated March 2005
- Other Less Impacting Options To Consider

1. Proposed Snohomish MLV/Pig Receiver & Launcher Station 1382

MLV station 1382 for the 30-inch pipe is currently located on my property within the boundaries of an 87 ½ foot wide easement NWP has with me. This station currently measures 19 ½ feet by 29 ½ feet (525.25 square feet).

On April 14th I was informed by NWP that they plan to expand this station to 70 feet by 150 feet (10,500 square feet). This represents an increase of 20 times its current size. My easement with NWP stipulates a maximum size of 20 by 30 feet. At this time I was told there would be a Pig Receiver at this location. I have since learned that it will also be a Pig Launcher.

IND14-1 The proposed new station at 1382 is of great concern to me, my family and the residents of my neighborhood. This is a high density area and does not warrant the addition of an "Industrial Use" station of this magnitude.

Since learning of the massive size of this Industrial Use station and research that I have done, it has caused me to wonder if NWP has future plans for this station that they are not exposing (at least to me). Why does this station need to be so large?

When NWP first approached me (March 15, 2005) they told me there would not be any changes to this station. I repeatedly asked NWP to confirm this. It took 4 weeks for NWP to tell me they did in fact plan to expand this station. This was only after I raised this question at the hearing and reviewed the EIS document myself. This has been a common theme with trying to get answers from NWP.

It is obvious to me that this station was not just planned in recent weeks. Why was this information withheld from me? I neither appreciate nor respect the way NWP has handled this. My property is a 5 acre parcel zoned R6. A structure of this nature scares my family and devastates the value and usability of my land.

My son and his friends use this area as a recreational place to ride go carts, mini bikes and play ball. This is also a playground for our dog and part of the nature trails that we have through our property. In addition we had seasonal use plans for this area. The Industrial Use MLV/Pig Receiver/Launcher station as proposed will impact all of these uses for my family and friends.

SUMMARY:

- The 70 by 150-foot station as proposed is not appropriate for this area. NWP should be asked to reconsider the design they have for this station.
- NWP has not provided me with a detail drawing or picture showing me what this station will be or look like. I require this information and they should provide it.
- NWP should be required to justify the proposed size of this station.
- NWP should be required to document any further plans they may have for this station. This should be provided to FERC, the city of Sammamish and the residents of Sammamish.

2. Proposed Temporary Work Area At 867 238th Ave NE, Sammamish Wa

NWP is proposing a temporary work area on my land that is located outside of the boundaries of their existing easement. This proposed temporary work area is approximately .73 acres. It is heavily wooded with 2nd growth timber.

IND14-2 As proposed NWP would remove 87 trees from my land for temporary use. These trees not only provide visual beauty to my family and the neighboring communities but they also provide a blast shield for the pipeline.

Also located in this temporary work area is a 14 by 65-foot batting cage with pitching machine. My son and his baseball team use this batting cage for individual and team practices. This batting cage sits just a few feet away from a sport court that the kids also use.

Individuals

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IND14-1 The proposed pig receiver and MLV at MP 1382.0 would be collocated with an existing aboveground facility within Northwest's existing right-of-way. Northwest's existing easement already precludes the use of the permanent right-of-way for certain activities such as the construction of aboveground structures, including house additions, garages, patios, pools, or other objects not easily removable. In addition, the expanded aboveground facility would permanently convert an additional 0.1 acre (35 feet by 120 feet or 4,200 square feet) within the right-of-way to an industrial use. Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including the feasibility of relocating the proposed pig receiver and MLV at MP 1382.0. General impacts on property values associated with the Capacity Replacement Project are discussed in section 4.9.5.

IND14-2 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with the loss of trees and alternatives to the proposed access road and temporary extra workspaces.

IND14-2
(cont'd)

Our yard is currently a natural setting and playground for children and adults to enjoy. When my wife and I purchased this property 7 years ago our dream was to create a safe and fun place for children. A place where kids wanted to come play and have fun and a place where their parents felt comfortable with them being.

This play area will be virtually unusable during the construction phase of this project and an uncomfortable place to be once it is done. Yes I will be able to put the batting cage back up once the project is complete and the kids will only miss one year of use. But with the remaining devastation and an Industrial Use valve station right next to it, I probably won't even bother. Parents probably won't even want their loved ones to play here anymore.

The really sad part of all this is that there is no need for NWP to remove these trees to obtain a temporary work and storage area. Immediately to the west of my property line and where NWP proposes cutting 87 trees is a wide-open non-treed area. The impacts on using this area would be minimal. I have walked the land and shown countless people what NWP wants to do. Not a single person has been able to understand it or even believes it.

With what NWP is proposing, they are destroying the value of my property and the quality of my family life. I have a very unique piece of land which is in short supply in Sammamish and NWP should not be allowed to destroy it especially when other and less impacting options exist.

At the FERC hearing I attended on April 12th in Redmond Wa, it was mentioned in closing by FERC that this project was *not yet approved*. And that *impacting* temporary work areas could be reconsidered and adjusted or possibly moved if appropriate. This was encouraging to me. I thought great, NWP will consider other options.

But my hope was short lived. Immediately after the meeting I was approached by a NWP representative. In our discussion, I tried to explain some other options that I would like NWP to consider. It was suggested that changing these things was not that easy.

This is in alignment with what another NWP representative told me. Which was that if they were to change their work areas they would have to go back through the approval process. I can understand this taking time and not being something that NWP wants to do. What can FERC do to encourage NWP to review other options and help them to shorten the process? Is there anything I can do to help? I should not have to take the brunt of this.

SUMMARY:

- NWP must be required to use the other non-impacting options they have and avoid the removal of these trees.
- If NWP says using the area to the west of 1382 is not possible. They should be required to study and show why it is not possible and provide the information found in the study to FERC and to my community and to me.

IND14-3 **3. Impacts To Our Land, Family and Community**

Placing this proposed industrial use station on our property takes away our reserved right to use of the land. In the process it destroys 373 feet of native growth and Blast Shield. It limits NWP accessibility to the eastside of this station. It makes our use of this land very limited.

This will be an unpleasant eyesore that will be impossible to disguise. It will be visible from our patio, back yard, side yard, sport court, driveway and entire outdoor living area.

We will now be open to extreme noise from the roads, neighborhoods and the city. It precludes our family's dreams for utilizing this open space in the future. Including recreational use and seasonal income opportunities.

My acreage property is my retirement. It is zoned R6. The addition of this Industrial Use station has long-term impacts making it less attractive for future potential development and thus devalues my property significantly.

Not only does it reduce the number of lots that could be platted in the future due to the reduction in open space. it also affects the land adjacent to the easement making it a much less desirable place to live.

This pipeline was constructed in the 1950's when this entire area was unpopulated and forested. At that time, there were no conflicts with a pipeline or valve station being here. Since that time however, this area has grown to be a populated area of high density. The growth in this area was so significant that in recent years it became a city.

The property to the west of me was a Lama farm when I moved here. It has developed into a residential neighborhood with many acres of open space. It has a walking trail that is used by the public. We understand the City of Sammamish is considering acquiring this trail. The trail runs next to our property to the west. If this becomes City property, then why not move at least part of this station onto the public property. By adjusting the position of this station it should help preserve these mature trees.

SUMMARY:

- The location of the 1382 Industrial Use station should be reconsidered.

4. Potential Impacts To Our Private Community Water System

I am one of 4 people connected to a Group B community well that stands to be impacted by this project. NWP proposes to access the pipeline across this well and use the surrounding area. The activity that is proposed in and around our well puts it and our families at great risk. NWP claims they can protect our well but can they

Individuals

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- IND14-3 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with the loss of trees and alternatives to the proposed access road, temporary extra workspaces, and aboveground facility. See also the response to comment CO3-6.

really. And why should they even put it at risk when there are other better options available.

IND14-4

There are several other options available to access this pipeline that would not put a well and it's users at risk. We have repeatedly asked NWP representatives to consider these other options but they continue to ignore our requests.

Again to the west of us is open land. As we see it they could come in off NE 8th street and travel north across open land with no homes (or plans for homes) directly to the valve station 1382. Yes they would have to construct an entrance but they do that all the time. They could also enter off NE 8th street and 235th and travel down an existing access road which leads directly to the valve station. They could also enter off 10th place and access the valve station.

During one of the visits I received from NWP representatives I asked why they would be proposing using this land around the well for a temporary work and storage area. They even seemed a bit surprised and suggested that NWP probably did not even realize there was a well in this area. This in it self is surprising given that there is a big sign in front of the well house and facing the pipeline reading "Well Do Not Spray". It seems that plans for our area were made at a very high level and should now be reconsidered.

For some reason NWP is just not willing to look at other better options. They seem to have made these plans and they are sticking to them with no consideration for those they are affecting.

SUMMARY:

- NWP must be required to use the other non-impacting options and avoid putting our community well at risk.
- If NWP says using the area to the west is not possible. They should be required to prove why it is not possible and provide that information to FERC and to me.

5. Potential Impacts To Our Private Community Road

I live in a private community of 10 homes accessed by a private dead end road which we as landowners own and share in the maintenance. NWP proposes to use our private road to access their pipeline for this project. Their access is for purposes of bringing in heavy equipment, supplies and workers.

IND14-5

This presents our community with a safety risk to our families and friends. It also puts the road itself and our utilities at the risk of being damaged. This road was not constructed to withstand frequent heavy equipment traffic.

NWP did not even directly contact the individuals that own this road to ask for their permission. At my first meeting with NWP I informed them that this was a private road and suggested that they talk to all of the people that own the road. They said they would but they never did. After several weeks passed my neighbor and I

Individuals

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IND14-4

Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with the loss of trees and alternatives to the proposed access road and temporary extra workspaces.

IND14-5

Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with increased traffic in the area and measures Northwest would implement to minimize damage to 238th Avenue. Section 2.2.1 has been revised to state that Northwest would conduct repairs that are necessary to ensure that access roads would support the load of heavy equipment during construction and would repair any roads or culverts it damages during construction. See also the response to comment CO4-1.

IND14-5
(cont'd) | decided that NWP was not going to address this with the people and so we had to do it. This is just one of many cases where NWP is simply not communicating with the community they are impacting. I certainly hope they pay more attention to details when it comes to pipeline safety then they have demonstrated with me in planning their land uses.

SUMMARY:

- NWP must be required to research the other non-impacting options they have available for access to their pipeline.
- If NWP says using the area to the west is not possible. They should be required to prove why it is not possible and provide that information to FERC and to me.

6. Comments On The Draft EIS document dated March 2005

In reading the Draft EIS document, It appears to me that our area at station 1382 has possibly been over looked in various sections of this document. I also noticed conflicting information between what the EIS document states and my understanding of NWP plans at my location.

IND14-6 | - **TABLE 2.2-1 Above Ground Facilities / Pig Launchers and Receivers**

In the column titled "Land Affected During Construction" it shows zero. However, NWP IS planning to effect my land above and beyond their easement at station 1382.

Fine print reference "a" also states "the other two pig launchers and pig receivers would be collocated with other aboveground facilities within Northwest's existing right-of-way and would not require any additional land outside the right-of-way during construction and operation".

IND14-7 | - **TABLE 4.8.1- Mainline Valves Along the Proposed Loops**

In the column titled "Land Affected During Construction" it shows zero for milepost 1382.0. Fine print reference "g" also states no additional land is required.

IND14-8 | - **Section 4.5.1 – Aboveground Facilities**

The second sentence of the second paragraph reads "These facilities would require only a minor expansion in the footprint of the existing facility".

I do not consider an increase of 20 times to be a "minor expansion". Station 1382 is currently 525 square feet. The proposed new station is 10,500 square feet.

IND14-9 | - **Section 4.8.3.1 – Existing Residences**

This section states that "Northwest would implement the following general measures to minimize construction related impacts...."

Individuals

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IND14-6 | See the response to comment CO3-6.

IND14-7 | See the response to comment CO3-6.

IND14-8 | See the response to comment CO3-6.

IND14-9 | Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with the loss of trees and alternatives to the proposed access road and temporary extra workspaces.

IND14-9 (cont'd) | "reduce the construction right-of-way and use other temporary extra workspaces farther from the residences where feasible".

"preserve mature trees....."

NWP is not following their own commitment here. Removing 87 2nd growth trees is not "preserving mature trees". And their proposed work area is less than 50 feet from my structure.

IND14-10 | - **TABLE 4.8.5-1 – Aboveground Facility Sites.... Reviewed for Potential Mercury Contamination**

The MLV located at 1382 is not listed in this table.

IND14-11 | - **TABLE D2 – Access Roads Associated with the Capacity Replacement Project**

Access to station 1382 from private drive 238th Ave NE is not listed in this table.

IND14-12 | - **Page E5-A.2 – Approved Areas Of Disturbance**

States "The construction right-of-way width for a project shall not exceed 75 feet"

NWP already has an 87 ½ foot easement with me and yet plans to use and additional 45 feet.

IND14-13 | - **TABLE P-1 – Residences and Other Structures Within 50 Feet of the Construction Work Area for the Capacity Replacement Project**

I have a structure located within 50 feet of the proposed construction work area and yet it is not listed in this table.

SUMMARY:

- It appears that the MLV station located at 1382 and the surrounding area has to some extent been overlooked. NWP should be required to do a detail project plan for this area and provide that plan to the impacted residences.

7. Other Less Impacting Options To Consider

Individuals

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IND14-10 | Table 4.8.5-1 identifies primarily meter station and compressor station sites where the potential for mercury and other contamination exists due to the work conducted at these sites and the materials that were historically used in the sheds and buildings at these facilities. The proposed pig receiver and MLV at MP 1382.0 would be collocated only with an existing valve site where the potential for this type of contamination does not exist. This is also true for the proposed collocated MLVs at MPs 1431.3, 1411.3, 1387.5, 1453.5, 1440.1, 1370.8, 1364.0, 1355.2, and 1351.7, which are also not identified in table 4.8.5-1. The proposed pig receivers and MLVs at MPs 1467.9, 1461.8, and 1408.8 are not identified in table 4.8.5-1 because these facilities would not be collocated with existing aboveground facility sites.

IND14-11 | Table D-2 in Appendix D has been revised to include 238th Avenue.

IND14-12 | Appendix E contains the FERC staff's Plan. The intent of the FERC staff's Plan is to assist applicants by identifying baseline mitigation measures for minimizing the extent and duration of disturbances on soils associated with projects under the FERC's jurisdiction throughout the country. Section IV.A.2 of the FERC staff's Plan states that the construction right-of-way width for a project shall not exceed 75 feet or that described in the FERC application (emphasis added). In its FERC application, Northwest proposed to generally use a 95-foot-wide construction right-of-way, consisting of its existing 75-foot-wide permanent right-of-way and 20 feet of new temporary extra workspace. Section 2.2.1 includes a discussion Northwest's proposed right-of-way configurations. Northwest also identified temporary extra workspaces that would be required for staging areas and construction at wetlands, waterbodies, and roads, and in areas of steep slopes and rugged terrain.

IND14-13 | Table P-1 has been revised to include the sport court and batting cage located within 50 feet of the proposed construction work area for the Capacity Replacement Project.

IND14-14 | There are several minimal impact options for work areas, storage areas and access to the pipeline and MLV station 1382. The options currently proposed by NWP make absolutely no common sense. And do not represent a "Common Good" decision. The current plans for this area must be reconsidered and a study of the other less impacting options must be done. Studying other options should include but should not be limited to:

- Use existing open non-treed land on the West side of 1382 for extra work areas, storage and access.
- Access pipeline from NE 8th street through open area to valve station 1382
- Access pipeline off NE 8th street via 235th. From there travel down an existing access road that takes you directly to the valve station area.
- Access pipeline off 10th place, which leads directly to the valve station area.

CONCLUSION

This project should not receive FERC approval as proposed without further research of the impacts in and around the 1382 station. It does not represent a good decision making practice. Nor does it represent consideration for limiting unnecessary impacts to the environment.

Thank you for reviewing and considering my above concerns. I look forward to your help in resolving these issues with an eye toward the "Common Good" so this project can proceed forward. Should you wish to contact me, I can be reached at 425-868-8660 (home) or 425-941-7939 (cell).

Sincerely,

Tim Gray

Tim & Mary Gray
867 238th Ave NE
Sammamish, Washington 98074

Cc: Mr Don Gerend, Mayor City Of Sammamish

Cc: Gas Branch 2, DG2E

Note: the following 2 pages contain jpg images

Individuals

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IND14-14 | Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including alternatives to the proposed access road, temporary extra workspaces, and aboveground facility.



PHOTO-1

This picture was taken West of my property looking South East. The fenced area is the 30-inch MLV station 1382. The foreground is the open space trail that the public has been using. The trees in the background are planned for removal by NWP. My house sites on the other side of these trees.



PHOTO-2

This picture was taken West of my property looking North East. The fenced area is the 30-inch MLV station. The foreground is the open space trail that the public has been using. The trees in the background are planned for removal by NWP. My house is located on the other side of these trees.

April 25, 2005

Magalie R. Salas, Secretary
US Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC WA 20426

RE: Docket Nos. CP05-32-000, -001
Applicant: Northwest Pipeline Corporation

Dear Secretary Salas:

I am a property owner in the Saddleback subdivision at 866 238th Ave NE in the city of Sammamish, state of Washington. This subdivision is a secluded ten family community serviced by a single, privately owned and maintained access road. There is also a single, private Group B community well (Saddleback Well #752102) that is the source of water to my property along with three other families in this subdivision. Additionally this well provides the source of water for the maintenance of the common areas of the community. This letter is in reference to the proposed "Capacity Replacement Project" by Northwest Pipeline Corporation.

The "Notice of Availability of the Draft Environmental Impact Statement for the Proposed Capacity Replacement Project" was provided to me by my neighbors, Mr. Julian Mart and Mr. Tim Gray, both of whom are property owners that have the current pipeline located on their properties. After reviewing this document, I find it disconcerting that the representatives of Northwest Pipeline Company chose to contact only those two families when there is severe impact to all families in the community. I find it very frustrating to learn of this situation only days before the deadline for public comments to be submitted. Nevertheless, the following addresses my comments and concerns for consideration and submission into the public record.

1 Background Information

The following represents my current understanding of the Northwest Pipeline project as it relates to my community:

The Capacity Replacement Project describes a proposed temporary work area (approx. 1.25 acres) to stage construction work and to provide access to the valve station. The proposed temporary work area identified would be located on Mr. Tim Gray's property (867 238th Ave NE) and Mr. Julian Mart property (809 238th Ave NE). This temporary work area will be created by the bulldozing of eighty-seven, seventy year old, second growth trees and the grading of a hillside that has an approximate slope of twenty-two percent (fifty feet rise over two hundred thirty feet) for the use as a parking lot, work area and pipe storage facility. Access to this temporary work area would be made via the community's privately maintained road. The construction will be performed over a period of 4 - 12 months time in which construction personnel of up to 200 people per day will be bused into the neighborhood. Additionally, NWP will be installing a station where pigs are introduced and/or removed from the pipeline.

2 Inadequate Notice

IND15-1

First of all, I would like to offer up a concern with regard to notification regarding this proposed temporary work area. The "Notice of Availability of the Draft Environmental Impact Statement for the Proposed Capacity Replacement Project" was provided by Northwest Pipeline Corporation only to Mr. Julian Mart and Mr. Tim Gray, both of whom are the property owners that have the current pipeline located on their properties. However, after recognizing that our well is located in the proposed construction area, there was no attempt made to inquire as to the purpose of the well and the impact on other parties. Subsequently our only notification regarding these impacts were

Individuals

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IND15-1

See the response to comment CO4-1.

• Page 2

April 25, 2005

IND15-1 (cont'd) provided via the diligence of Mr. Mart and Mr. Gray who contacted the rest of the neighborhood to ensure that we received notice - which of course we had not. This lack of information has provided us little time to research and understand the issues prior to the deadline for public comments to be submitted.

IND15-2 **3 Impact to Saddleback Well #752102**

At the lowest point of the proposed temporary work area is the Saddleback Well in our community. This is a private Group 8 community well (Saddleback Well #752102) that is the source of water for four families in this subdivision. Additionally this well provides the source of water for the maintenance of the common areas of the community. The location of this well inside the proposed work area is identified in Figure 1. Our subdivision of 10 families is concerned with the impact of this proposal on our well and subsequent water supply and would like to provide the following comments and concerns for consideration and submission into the public record.

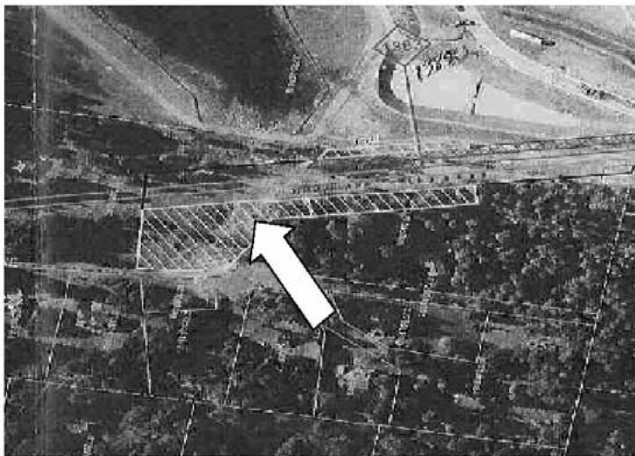


Figure 1 - Location of Well House in Proposed Temporary Work Area.

2.1 Construction Phase

According to information gathered from the Environmental Protection Agency and other sources, protecting soil structure and natural vegetation are among the best ways to protect water quality and quantity. Using techniques that enable water to flow naturally above and below the surface without adding pollutants provide the most benefits for the continued health of a community well. Based on these guidelines we feel have the following concerns

- The proposed grading of a twenty percent slope after all vegetation has been removed will be more than minimal impact to the well area.

Individuals

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IND15-2 Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with use of the proposed temporary extra workspaces on well number 752102.

• Page 3

April 25, 2005

IND15-2
(cont'd)

- This temporary work area will create a terrain that will drain to the wellhead as it is located almost directly at the low point of this area and the modified area will drain directly to the wellhead.
- All vegetation will be cleared as a result of this construction removing the natural buffer necessary for best water conditions.
- The documentation mentions no specifics regarding the restoration of the temporary area. There is no mention of any erosion control methods in the documentation. A barren, twenty percent slope in the Pacific Northwest will erode over the course of the project because of the amount of rainfall received in the area.
- Any fuel leaks from the numerous vehicles present in this space will undoubtedly enter the aquifer because of the slope and flow toward the wellhead.
- There is no mention in the documentation regarding the use of biodegradable detergents and chemicals in minimal amounts as a safeguard that will ensure the quality of our drinking water.
- Due to the act that the area directly surrounding the well will be utilized as a traffic corridor for the heavy machinery, this will compact the soil and will impact the natural flow of surface water.

2.2 Pipeline Replacement Phase**2.2.1 Worker Traffic**

The busing of between fifty to two hundred pipeline workers through the neighborhood and into the temporary work site on a daily basis will continue to inflict damage on the surface area directly surrounding the wellhead for the duration of the project. This damage could, at any time during or after this phase, cause contamination to the well and/or its ability to supply the quantity and quality of water necessary to sustain the four households dependent upon its existence.

2.2.2 Community Waterlines

The small diameter pipelines that transport water from the well to our homes are generally within twelve to eighteen inches of the surface. Because the soil is predominately sand and loose till, the weight of the construction traffic repeatedly traversing these pipelines will result in numerous fractures and the subsequent disruption of water to the corresponding household.

2.2.2 Existing Pipeline Abandonment

The current twenty-six inch pipeline is going to be abandoned. There are several concerns centered on this process:

- IND15-3 | • The long term structural deterioration of a pipeline abandoned in place may lead to some measure of ground subsidence.
- IND15-4 | • Corrosion of buried pipelines create the potential for impacts which may not appear in the water for several years afterwards, and will require our community to perform extensive and costly tests for elements beyond those normally tested for during the course of regular maintenance.
- IND15-5 | • Oil, chemicals and other surface may get into water by various means.

2.3 Post Project Phase

Individuals

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IND15-3 | See the response to comment CO4-3.

IND15-4 | The 26-inch-diameter pipeline would be filled with nitrogen after it is taken out of service, which would inhibit internal corrosion. Northwest would maintain cathodic protection on the 26-inch-diameter pipeline after it is taken out of service so that it could be eventually put back in service for future gas deliveries if approved by the DOT and other agencies. Maintaining cathodic protection on the pipeline would ensure that the pipeline would not rust and fail; therefore, ground subsidence or groundwater would not be able to penetrate into the pipeline. Because the 26-inch-diameter pipeline is collocated with the active pipeline(s) along Northwest's system, it would be monitored for potential problems at the same time as the in-service pipelines.

IND15-5 | See the response to comment CO4-5.

● Page 4

April 25, 2005

IND15-6	2.3.1 Enlarged Station Supporting Piggings Operations will increase the potential for chemical and toxic waste accidents which may render our well unusable.
IND15-7	2.3.2 Post Abandonment Responsibilities After a pipeline has been abandoned, the owner/operator retains a number of responsibilities. More particularly, the owner/operator may be responsible for ensuring that the right-of-way and any facilities left in place remain free of problems associated with the abandonment. For that reason, a right-of-way monitoring program should be included in the post-abandonment plan and accounted for in the abandonment budget. Additionally, the owner/operator may be responsible for maintaining post-abandonment information about the pipeline. This information should be recorded in a post-abandonment log book, so that it is available when needed and can be turned over to an alternate responsible authority if required by future regulations. The post-abandonment log book should contain items such as regulatory permits and conditions attached to permits, including reclamation certificates; full particulars on any pipeline facilities abandoned in place, including a physical description, location and depth of cover, plug locations, and details of any sections filled with a solid material; records of any changes in pipeline state from the original abandonment plan and records of any areas that become contaminated after the abandonment and reclamation work is complete. These records and log book should be available to us to provide to the Washington Department of Ecology when performing testing and certification of this well.
IND15-8	2.3.3 Alternative Water Sources In the event of permanent loss of this well, NWP states in their document that they will be responsible for attaining a permanent, alternative water solution for each household impacted. This responsibility must include but not be limited to: <ul style="list-style-type: none"> - Costs associated with City of Sammamish water allotment process - Costs associated with the installation of water meter. - Costs associated with any necessary pipeline from the meter to the house. - Continuing (monthly) costs associated with the integration of our households to the city water system, which otherwise would not have been necessary because of our use of the Saddleback Well. - Unforeseen costs associated with the integration into the city water supply that are unknown at this time but can be proven to be necessary as a result of our need to integrate into the city water system.
	3 Impact to 238th Ave NE
IND15-9	3.1 Roadbed Deterioration The proposed temporary work area requires access via our community's private asphalt road. We believe that this would result in damage to the road due to the many tons of construction equipment and supplies that would move along our road to the work area. Our road was designed for light vehicle use and not to be utilized as planned by NWP. It is unimproved (no sidewalks) with culverts for water diversion on both sides of the road. If not driving, residents must walk on the road to enter or exit our subdivision. Our road is maintained solely at the expense of the families that live in this neighborhood. We believe that public road alternatives exist that provides a high degree of access for NWP. These public roads were designed for all types of vehicles including heavy construction equipment.

Individuals

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IND15-6	See the responses to comments CO4-5 and CO4-6.
IND15-7	See the response to comment IND15-4. Following abandonment, Northwest would maintain monitoring records as required for interstate pipelines regulated by the DOT's OPS. Northwest also works closely with the WUTC. Records and other information on all facilities would be provided to these agencies.
IND15-8	See the response to comment CO4-8.
IND15-9	Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with increased traffic in the area and measures Northwest would implement to minimize damage to 238 th Avenue. Section 4.8.3.1 has also been revised to include alternatives to the proposed access road and temporary extra workspaces. Section 2.2.1 has been revised to state that Northwest would conduct repairs that are necessary to ensure that access roads would support the load of heavy equipment during construction and would repair any roads or culverts it damages during construction.

• Page 5

April 25, 2005

IND15-9
(cont'd)

The alternative routes, which provide direct access to the pipeline easement and valve station from the west, are as follows:

- NE 8th St to 233rd Ave NE to NE 10 PL
- 228th Ave NE to NE 14th St to 236th Ave NE
- NE 8th St to 235th Ave NE to gravel access road

IND15-10

3.1 Neighborhood Security

With the introduction of between 50 and 200 personnel to our neighborhood on a daily basis of course safety is of primary concern. We have not been provided with any detail regarding the work days and hours of these personnel or any controls in regard to their access to any of the properties in our community. We would anticipate that appropriate measures must be defined in order to ensure our continued privacy, security and protection of property.

IND15-11

3.2 Quality of Life

While quality of life can be subjective, this neighborhood has a well established sense of community, privacy, peacefulness and security. Key areas of concern with regard to protecting this are:

- The trees designated for removal on Mr. Gray's property provide not only a privacy but also noise control to our community.
- Introduction construction equipment, noise and personnel in our small residential area provide major disruptions to all of the above quality of life components - privacy, peacefulness and security.

4 Alternative Temporary Work Locations

IND15-12

While it appears that there has been some consideration regarding our concerns we do not feel that we have been provided appropriate details to assuage our issues. Additionally, we believe that other alternatives for locating the temporary work location exist that have minimal impact on established neighborhoods like ours.

The main alternative that we see is a work area immediately to the west of the valve station. This area is currently cleared and flat. Access to this work area would be from NE 14th St and 236th Ave NE (see Figure 2) or from NE 8th St. Another alternative is the existing pipeline easement South of NE 8th St (see Figure 1). In addition there is another section of land adjacent to the pipeline that is undeveloped and its use should be explored (see Figure 3).

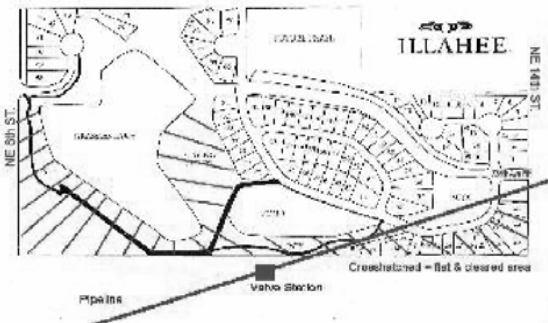


Figure 2 - Proposed Alternate Site for Proposed Temporary Work Area

Individuals

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IND15-10

Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including the FERC staff's recommendation that Northwest file a Residential Area Work Plan for the Saddleback Subdivision that includes proposed construction and mitigation measures to minimize impacts on this area (see also mitigation measure number 22 in section 5.4). Section 4.8.3.1 also explains how the public can view the plan once it is filed.

IND15-11

Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision, including impacts associated with the loss of trees and alternatives to the proposed access road and temporary extra workspaces.

IND15-12

Section 4.8.3.1 has been revised to include a discussion of the Saddleback Subdivision and alternatives to the proposed access road and temporary extra workspaces.

6-376

• Page 6

April 25, 2005

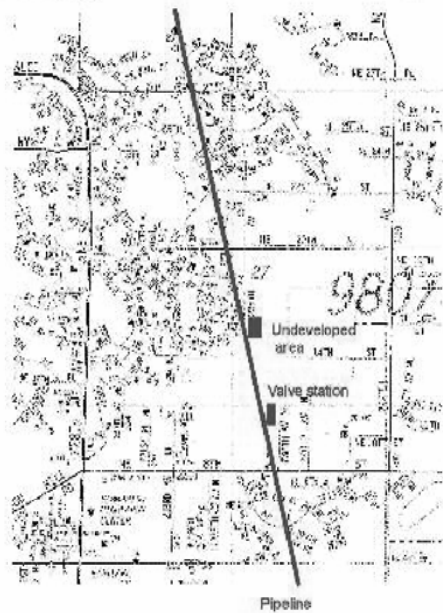


Figure 3 - Proposed Alternate Site for Proposed Temporary Work Area

In closure we, as indicated by our signatures, want to go on public record with our concerns as stated in the preceding paragraphs. We will not grant Northwest Pipeline Corporation right of way over our private road for access to the proposed work area until other alternatives are researched. The research results should be shared with all residents in the neighborhood.

Sincerely,

Gerald J. Gibson
Susan A. Boyden

866 238th Ave NE
Sammanish, WA 98074

Cc: Marianne Scharping, Senior Land Representative, Northwest Pipeline Corporation
Rex Johnson, acquisition supervisor, Northwest Pipeline Corporation

Individuals

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6-377

200504255017 Received FERC OSEC 04/25/2005 01:07:00 PM Docket# CP05-32-000, ET AL.

April 24, 2005

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Cc: Gas Branch 2, DG2E

Re: Docket No. CP05-32-000,-001/ Capacity Replacement Project

Dear Ms. Salas:

IND16-1 We would like to thank the FERC for holding the recent follow up public scoping meeting in Redmond, Washington in regards to the potential pipeline capacity replacement project. Doug Sipe did a good job of running the meeting and allowed public members to comment and raise good questions and concerns. Can you please explain how these comments at the public meetings are collected and addressed within the revised EIS draft? Can you clarify where the comments are published and respective feedback is published as well?

We are writing this letter to indicate our continued concern and opposition to part of the proposed capacity replacement project that will replace a part of the approximately 80 miles of pipe over the 260 mile pipeline in Washington State. The portion that affects us directly is the 11.89 stretch known as the Snohomish Loop. This would affect our Deer Park neighborhood located in Sammamish.

IND16-2 We would like further clarification if this project is truly necessary from a pipeline safety perspective or a capacity perspective and if alternative options & pipeline locations are possible rather than tearing up the middle of highly populated neighborhoods like those on the Sammamish plateau.

From the initial discussions about this project, attending the public meetings, discussing the project among fellow homeowners, discussing with registered landscapers, certified arborists, legal advisors, reading about the project in local newspapers, and individual meetings with Williams representatives many homeowners and ourselves now have additional concerns regarding this effort.

Listed below are some of the concerns and questions that we would like the FERC to review and address in the Revised Draft – PLEASE clarify where these responses are addressed specifically within the document.

IND16-3 1. Buried Sewer lines intersect the pipeline in/ near our backyard – how will these be maintained during the project? How can we be ensured that the lines will be properly re-connected and no damage/ flooding/ etc. result during and after the project is complete? If there are problems, who do we contact to correct the matter? Who is liable to ensure this is corrected if a problem occurs?

2. A Buried Storm-water drain Line from the street intersects the pipeline in our backyard - how will this be maintained during the project? How can we be ensured that the line will be properly re-connected and no damage/ flooding/ etc. result during and after the project is complete? If there are problems, who do we contact to correct the matter? Who is liable to ensure this is corrected if a problem occurs?

IND16-4 3. How will Williams be rebuilding our retaining wall (rockery) and re-establishing landscape elevations to heights prior to the project (i.e. Hills on side of yard). Our concern is we have a retaining wall that part of it is within 20 feet of the pipeline center, if part of the rockery wall is removed, and the remaining small part of the rest of the wall left in place, the wall will fall apart onto our patio. Will Williams work with us to remove the whole wall and re-place afterwards?

IND16-5 4. Will Williams assist /compensate for the EARLY removal of some landscaping items so they can be salvaged and re-planted or reused. (Example – Plants/ Shrubs in Right of Way can be moved, stored temporarily, and then re-planted) How soon can we be notified so we know if we need to move landscaping or not, if the project is approved or scope is changed?

Individuals

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IND16-1 Each public meeting was recorded. The transcripts from the public meetings were reviewed to identify each specific comment on the draft EIS. A number was designated for each specific comment and the comment was assigned to the most appropriate EIS team member for response. All comments on the draft EIS and the FERC staff's responses are included in section 6.0 of the final EIS. Where necessary, changes to the text of the draft EIS were made in response to specific comments. The vertical line in the margin of the final EIS identifies text that was modified from the corresponding text in the draft EIS. This same process was followed for written comments. The public has the opportunity to comment on the final EIS after it is issued. Comments received after issuance of the final EIS would be addressed in the Order Issuing Certificate and Permitting and Approving Abandonment under section 7 of the NGA that would be issued by the FERC if it decides to approve the project.

IND16-2 The purpose and need for the project are described in detail in section 1.1. A detailed discussion of alternatives to the proposed project is included in section 3.0.

IND16-3 Section 4.9.3 has been revised to include additional information on measures Northwest would implement to locate and protect storm sewers and other utilities. Section 2.5 describes the environmental compliance inspection and mitigation monitoring program that would be implemented to ensure that activities associated with the Capacity Replacement Project are conducted in compliance with permit requirements and landowner specifications. See also the responses to comments IND6-5 and IND6-6.

IND16-4 See the responses to comments IND6-5 and IND6-6.

IND16-5 See the response to comment IND6-5. Northwest would notify landowners in writing at least 30 days before the start of construction and would follow up with a personal contact within 7 days before construction.

- IND16-6 5. There are new concerns over NGOs or other parties who might cause incidents during the pipeline project. Recently an organization named "ELF" claimed responsibility to setting explosive devices and burning down a few homes in the Sammamish plateau area in protest to the homes cutting down only a few trees at new home sites. How will they react to several trees being cut down over several neighborhoods? How can FERC and Williams ensure protection against this? What liabilities do homeowners have? What does Williams have regarding this? In the recently noted events above, one homeowner lost everything and is now in financial ruin – we need to be ensured similar events won't occur due to a project like this that have such an environmental impact.

The following comments were provided by a neighbor to several of us regarding the project steps:

"During our recent meeting with Kit, one of the Williams contract representatives, we asked that the following question be submitted by him to Williams. Kit got back to me today with this answer:

- IND16-7 Q: Why is there a two-stage construction process (dig up the existing pipeline, fill the trench back in, the at a later date re-trench for the new pipe)?

A: When the existing 26-inch pipe is dug up, there is no equipment large enough that can straddle the exposed trench and then proceed to dig it out even deeper and wider (for the larger pipe). For this reason, the exposed trench is backfilled and allowed to settle before a trencher comes along later and uses the level ground as the base into which to dig the larger, deeper trench for the new pipe."

Based on the answer above from Williams, we would like to see a detailed schedule and timeline of the steps that will be taken should this project continue. This will be necessary to ensure timing of homeowner activities like pre-project movement of landscaping, patios & other construction, etc. and proper planning and timing of re-landscaping and re-planting based on the weather, planting seasons, etc.

6. What will be the final timeline of each phase of the project?
7. Please clarify the actual project steps and timelines between each phase
- o Clearing of area
 - o Removal of current pipeline
 - o Backfill/ Refilling trench with dirt
 - o Settling of dirt timeframe
 - o Re-digging new trench and placement of new pipeline
 - o Filling in dirt
 - o Re-establishing the elevations on land (i.e. Hills, etc)
 - o Testing/ qualification/ any updates/ modifications
 - o Approval to begin re-landscaping

- IND16-8 8. Can homeowners have access to back areas of our yards via the pathway for PRE-project landscaping or construction projects? (i.e. removing existing plants, trees, decks, etc) When would the timelines for this be clarified?
9. What about AFTER completion of installing and testing the new pipeline? HOW/ WHEN will homeowners be notified that they can begin to re-landscape yards or rebuild decks, etc? Can this notification be given early enough to arrange sub-contractors versus notification only AFTER the WHOLE project is completed for the whole pipeline?
10. Will landscapers have access to the back area via the path/ ROW once the work is completed? Will there be ways to coordinate this among homeowners, landscapers, reconstruction groups?
11. When will Williams know specific schedule timelines and when can they communicate this to the neighborhood so people can plan, pre-removal projects and post project rebuilding of yards, decks, etc.

- IND16-9 12. Will there be any coordination of rebuilding of fences? Will there be a specific location marked for placement of fences or natural fences (i.e. Shrubs), etc?

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- IND16-6 As discussed in sections 2.3.2 and 4.8.3.1, a security guard would be present during non-working hours. In addition, section 4.12.4 contains a discussion of terrorism.

- IND16-7 Section 4.8.3.1 includes a detailed discussion of the steps and associated timelines for construction through the Deer Park Subdivision. See also the response to comment IND1-5.

- IND16-8 See the responses to comments IND1-5 and IND6-5.

- IND16-9 See the response to comment IND6-2.

IND16-9 (cont'd)	13. Please explain WHY fences must be relocated further away from the pipeline, considering the new pipeline will be placed deeper in the ground and made from a more durable material than the current pipeline. The current fences and hedges in place have been located over/ near the pipe for several years with no issues. If additional work is ever required in the future, these fences/ shrubs would have to be removed again anyway and relocating them offset from the pipe centerline does not seem helpful to homeowners. Provided fence posts and shrubs are selected that do not interfere with the buried pipeline could we maintain the same locations for the fences/ natural fences (hedges)?
IND16-10	14. If in fact fences/ hedges/ shrubs must be located to different locations than today (i.e. 4-5 feet off the pipeline centerline), thereby reducing the overall usable area of homeowners backyards, How will homeowners be compensated for the loss of land use that would now be behind this fenced area? Who will maintain this 'other' land (e.g. mow grass, etc - will homeowners associations be expected to maintain this and mow at same time as the center pathway?
IND16-11	15. Will the FERC please provide any reasonable guidelines on estimated replacement costs for trees and other landscaping? Many homeowners are concerned about the methods of calculation for 'value' of trees or plants (ex 60' tree valued at 6 - 10' trees versus value of 60' tree - is this fair? How can FERC ensure homeowners are getting fair realistic estimates to replace and replant new landscaping?) What about the cost of replanting as well as the cost of the plant itself? What is the guideline for estimating this additional cost?
IND16-12	16. What is the recourse homeowners have for unsatisfactory work or damages to homes, yards, trees, and goods caused during and after the construction phase of the project?
IND16-13	17. Can we get a specific contact list of parties involved in the project from the FERC, Ecology, local project manager, safety, and security, etc. - Can a single list be provided with all these stakeholders instead of 'collecting' cards/ names randomly. Then ALL homeowners will have a complete list to ensure good communication of project matters.
IND16-14	18. Are there any exceptions being made regarding the 'right of way' or temporary construction workspace giving some flexibility to the 20' distance (for example) in some locations along the project to minimize loss of shrubs, trees, patios, etc? Currently the Impression Williams is giving homeowners is 20' period no exceptions. There are some cases where landscaping or patios/ decks could be saved if the 20' distance was slightly modified in some areas.
IND16-15	19. Can alternate temporary construction workspace areas be placed in other locations where fewer trees are affected and potentially cut down? Comments at the recent FERC public meeting indicated one area where as many as 87 trees would be cut down for a 'temporary' workspace? This seems unreasonable considering nearby that area is an empty field that could equally suffice? How will the FERC work with Williams to ensure this is considered to limit the effect on the environment and neighborhoods?
IND16-16	20. Have Alternatives to this project really been considered? <ul style="list-style-type: none"> o Can the pipeline be repaired without digging up the pipeline in all areas? o Can the 'looping' project be done in another location other than thru the highly populated Sammamish Plateau? o Is the additional capacity from this new pipeline truly necessary?
IND16-17	21. Can other existing pipelines handle capacity requirements without having to update this pipeline?
IND16-18	22. What about the pipeline safety? Is the current pipeline a safety issue or a capacity issue?
IND16-19	23. What about the safety of the other parallel pipeline? Can it be impacted during this project? How is this pipe being protected with all the construction traffic?
IND16-20	24. If there are issues during construction, who do we contact?
IND16-21	25. Will a similar project be required on the other parallel pipeline shortly after this project is complete? (further affecting the environmental eco-system in the area)

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IND16-10	See the responses to comments IND6-2 and IND6-3.
IND16-11	See the responses to comments IND6-3 and IND6-5.
IND16-12	Section 2.5 describes the environmental compliance inspection and mitigation monitoring program that would be implemented to ensure that activities associated with the Capacity Replacement Project are conducted in compliance with permit requirements and landowner specifications. See also the response to comment IND6-6.
IND16-13	Contact information for the FERC, the WDOE, and the COE is provided in the To the Party Addressed Letter at the beginning of the EIS. Before construction, Northwest would provide affected landowners and municipality offices with the telephone numbers and contact names for Northwest's local land representative(s), construction office(s), and a project "hotline" to Northwest's office in Salt Lake City, Utah and the FERC's Enforcement Hotline.
IND16-14	Non-standard parallel offsets have been incorporated into the proposed loops in some locations to avoid site-specific features; however, a standard 20-foot offset is preferred for operation and maintenance purposes as well as for safety considerations. To reduce the offset in certain locations but not others would create operational and safety concerns because it is critical for Northwest Operations personnel to know exactly where the pressurized operating pipelines are located on the easement. A frequent change in the relative location of the pipelines would create a risk of not correctly identifying the pressurized lines. In addition, the placement of the new loop less than 20 feet from the existing 30-inch-diameter pipeline would not necessarily reduce the total amount of workspace needed for construction of the Snohomish Loop. Northwest would still require the use of its entire 60-foot-wide permanent right-of-way in order to remove the existing 26-inch-diameter pipeline and install the new loop. Section 4.8.3.1 has been revised to include additional information on using a reduced offset (i.e., less than the standard 20-foot offset) from the existing 30-inch-diameter pipeline in the Deer Park Subdivision. See also the response to comment IND6-2.
IND16-15	Before construction, the FERC would review Northwest's site-specific residential construction mitigation plans and would work with Northwest to identify areas where the proposed temporary extra workspaces could be reduced or changed to minimize impacts on residential areas.
IND16-16	Section 3.0 includes a detailed discussion of the alternatives considered for the Capacity Replacement Project.
IND16-17	Section 3.2.1 includes a discussion of the possibility of other existing pipeline systems being used as an alternative to the Capacity Replacement Project.
IND16-18	The purpose and need for the project is described in detail in section 1.1.
IND16-19	Northwest would spread the subsoil excavated from the trench over the working side of the right-of-way where its existing pipelines are located to

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- IND16-19 (cont'd) provide additional protection for the pipelines from the tracking of construction equipment. Northwest has successfully and safely used this technique during construction of other projects (e.g., the Evergreen Expansion Project).
- IND16-20 Section 2.5 includes a discussion of the Landowner Complaint Resolution Procedure that would be implemented during construction of the Capacity Replacement Project.
- IND16-21 Section 2.7 has been revised to address the potential future need for Northwest to replace the existing 30-inch-diameter pipeline.

- IND16-22 26. What about reviewing the idea of non-standard parallel lines for the two pipelines? Could they be placed closer together in some areas since it was stated the trench would have to be filled and redug after the current pipe is removed. Is this possible in some areas to limit environmental impacts to some homeowners?
- IND16-23 27. If the project proceeds, will FERC representatives be present during and after the project? Will any further public meetings be held during and after the project to ensure homeowners and project stakeholders are win-win successful?
- IND16-24 28. Construction transportation vehicles will be traveling across several neighborhood roads in addition to up/ down the pathway. Will Williams be responsible to repair or repave the roads should damage/ unnecessary wear occur?
- IND16-25 29. How will Williams ensure the foundations of homes are not damaged during this project? Many homes are located very close to the construction area and there is concern the use of heavy machinery nearby will cause foundation problems. Will Williams pay for initial inspection, follow-up inspections, and repair of any damages?
- IND16-26 30. Currently there is concern of a potential drought due to lack of snow. Because of this there may be water rationing in our area which could affect replanting after project completion. Williams has stated each homeowner will have to "deal with this themselves with 'whoever' we choose to landscape". How can we ensure this is properly addressed by Williams and ensure compensation is fair/ revised should this occur? Additionally if the project completion is delayed, and re-landscaping must be delayed too, how will Williams or the FERC re-adjust compensation and extend security watches until homeowners can complete re-construction/ landscaping? (Ex. Can't replant trees in the middle of winter)

Home Value and Neighborhood image is impacted

- IND16-27 • When we purchased our home a year ago we were attracted to the mature landscaping of this quiet neighborhood. We are VERY concerned that removal of large trees, shrubs, and other landscaping caused by this proposed project will impact the value of our house and the overall aesthetics of our neighborhood. This neighborhood is currently very quiet and secluded. We are equally concerned over how a construction project of this magnitude will impact this region before, during, and after construction and repair efforts.
- IND16-28 • A project like this will impact the tax value of our land. Would this be communicated to the state and government tax offices? Home appraisal impact? Etc?
- IND16-29 • We have concerns over potential damage to our home including damage to the foundation, roof, ventilation, furnace, etc. that would be caused during a pipeline removal and replacement construction project.
- IND16-30 • We have concern about a potential increase in crime while backyards are open. How would this be addressed?
- IND16-31 • We are also worried about the impact to the walkway trail, it's landscaping and entrances. Currently many people use these, including children when walking to school.
- IND16-32 • Could the trail be restored back to its original condition? Although Williams retains easements, the trail pathway has been beautifully maintained by Deer Park and other community Home Owners Associations and nurtured lovingly for many years – we are concerned this level of commitment will not be followed nor the area restored.
- IND16-33 • Currently, Williams states they have a 75 foot easement. They are proposing the use of additional footage, in some places using up to 90 feet or more, to accommodate the dirt and heavier machinery needed to replace the existing pipe. At some of our homes, this additional land use amounts to having Williams rip up the majority of our backyards. In addition, hundreds of large, some over 100ft tall, evergreen and deciduous trees are targeted for removal if this project continues as planned. This is alarming.
- IND16-34 • Our house has neighborhood water management (street water and sewer lines) that run from the street to the backyard, intersecting the pipeline. How would this be impacted? How would they ensure this is not damaged? Could this affect the water flow of this runoff system from the street?

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- IND16-22 See the response to comment IND16-14.
- IND16-23 Section 2.5 has been revised to indicate that, in addition to Northwest's environmental inspection program, full-time third-party compliance monitors representing the FERC would be present on the construction spreads to monitor compliance with project mitigation measures and requirements. Section 2.6 describes the operation, maintenance, and safety controls that would be implemented after construction of the project.
- IND16-24 Northwest would move tracked equipment across roadways on tires or mats to prevent damage to paved roads. Gravel roads would be regraded and regaveled if needed during the final cleanup phase of the project. Northwest would repair any damages to roads using proper materials and to the satisfaction of the person or entity responsible for the road. Section 2.2.1 has been revised to state that Northwest would conduct repairs that are necessary to ensure that access roads would support the load of heavy equipment during construction and would repair any roads or culverts it damages during construction.
- IND16-25 See the response to comment IND6-6.
- IND16-26 See the responses to comments IND6-3 and IND6-5.
- IND16-27 General impacts on property values associated with the Capacity Replacement Project are discussed in section 4.9.5. Section 4.8.6 includes a discussion of impacts on visual resources associated with the Capacity Replacement Project.
- IND16-28 General impacts on property and tax values associated with the Capacity Replacement Project are discussed in section 4.9.5.
- IND16-29 See the response to comment IND6-6.
- IND16-30 Section 4.8.3.1 includes a discussion of safety measures Northwest would implement during construction through the Deer Park Subdivision, including the installation of 6-foot-high chain link sections of fence to create a continuous boundary to separate the work area from the homes and the posting of a security guard within the work area during non-working hours.
- IND16-31 Section 4.8.4 includes a discussion of the impacts on the community trails in the area.
- IND16-32 As discussed in section 4.8.4, Northwest would allow the right-of-way to continue to be used as a recreational trail following construction.
- IND16-33 As discussed in section 4.8.3.1, the construction right-of-way through the Deer Park Subdivision would generally be 60 feet wide except where temporary extra workspaces are required for truck turn arounds and road crossings.
- IND16-34 Section 4.9.3 has been revised to include additional information on measures Northwest would implement to locate and protect storm sewers and other utilities. See also the response to comment IND6-6.

Concern over Security and Safety

- IND16-35 • This is a densely populated area with several schools nearby, lots of children, trail-walkers, and other traffic. The current pipelines are already a risk for such a highly populated neighborhood. Replacing the non-active 26" pipe with an active 36" pipe may increase capacity, but it may also increase the risk of damage should a problem occur. We propose considering other methods or different locations for a 'loop' to meet needs.
- IND16-36 • We have concerns over security if a project like this occurs. How would the area be kept safe and secure? How would homes be protected from risk of theft and damage possibly increased by the removal of backyard fences, shrubs, trees, etc.?
- IND16-37 • We are also wondering how this would impact fencing? Would it be removed? Repaired? Replaced?
- IND16-38 • How would trash be managed during a pipeline removal project (including removing the old pipe, dirt, landscaping, etc?). What about the new pipes waiting to put in place? Where would the pipeline and materials be stored prior to an installation? We've all seen pipes along the sides of a road during replacement projects. These are legitimate safety concerns, especially with many children and teens located in Deer Park.
- IND16-39 • What about the open ditches, dirt piles and heavy machinery? These are just a few of the many eye sores that can be listed. With two elementary schools in the nearby vicinity, hundreds of unsupervised, young children are at potential risk of injury.
- IND16-40 • Is there any safety concern about using the existing 30" pipeline during a re-construction?
- IND16-41 • We're concerned about how this could impact traffic in the area? This would not only impact local traffic but also city and school bus routes, etc.
- IND16-42 • How would construction areas and homes be protected?
- IND16-43 • Where would all the construction equipment and workers vehicles be located during construction? Would this impact traffic as well?
- IND16-44 • Noise and pollution from the heavy machinery required for this project will be significant.
- What about health related issues due to dust, dirt, noise, stress, etc.? How would these be addressed?

Environment is negatively impacted

- IND16-45 • Tree and other landscaping removal during a proposed project like this WILL impact our neighborhoods' natural eco-system and upset the habitat immensely.
- IND16-46 • Currently the peaceful Deer Park neighborhood is home to several wildlife animals including: deer, elk, coyotes, chipmunks, squirrels, rabbits, raccoons, doves, ducks, geese, hawks, stellar jays, owls, woodpeckers, and many other birds and animals. Any impact to this environment, such as the loss of many large trees and shrubs along the trail running through our neighborhood and in our yards, will constitute a significant loss of wildlife habitat. It would also result in loss of shade, noise prevention, and decrease the overall beauty of our neighborhood.
- Removing large trees in an area can impact the overall stability and root structure of other nearby trees and plants too. This could cause further damage to homes and landscaping long after a project like this is completed.
- IND16-47 • Within the pipeline/ pathway trail, our yard, and other neighbor's yards there are a variety of trees and shrubs. These include cedars, firs, alders, birch, cherry, and maple trees, rhododendrons, berries, etc. We are concerned that if these were to be removed and not properly replaced it would further impact both the neighborhood's beauty and value.
- Trees create privacy and reduced noise from neighbors and trail users. Removing these would take away from the tranquility of this neighborhood.
- The cost to the environment as well as the cost of replacing this type of landscaping is significant. Can you consider ANY way to avoid causing these environmental issues?

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- IND16-35 Section 3.2.2.2 includes a discussion of alternative pipeline loop locations.
- IND16-36 See the response to comment IND16-30.
- IND16-37 Section 4.8.3.1 includes a discussion of the removal of fences in the Deer Park Subdivision.
- IND16-38 Section 4.9.3 includes a discussion of how Northwest would manage solid waste generated by the Capacity Replacement Project. Northwest has identified several pipe storage and contractor yards that would be used to support construction activities. The locations of these pipe storage and contractor yards are presented in section 2.2.4 and shown on figure B-9 in Appendix B.
- IND16-39 See the response to comment IND16-30.
- IND16-40 Northwest would spread the subsoil excavated from the trench over the working side of the right-of-way where its existing pipelines are located to provide additional protection for the pipelines from the tracking of construction equipment. Northwest has successfully and safely used this technique during construction of other projects (e.g., the Evergreen Expansion Project).
- IND16-41 Section 4.9.4 includes a discussion of the impacts on traffic associated with the Capacity Replacement Project.
- IND16-42 See the response to comment IND16-30.
- IND16-43 Section 4.9.4 includes a discussion of the impacts on traffic associated with the Capacity Replacement Project, including information on where worker vehicles would be parked during construction.
- IND16-44 Section 4.8.3.1 includes a discussion of measures Northwest would implement to minimize impacts associated with dust and noise during construction.
- IND16-45 Section 4.6.1.2 addresses the loss of habitat and the displacement of animal species that would occur as a result of construction. Although the level of the impact may seem significant on a local scale (i.e., neighborhood scale), most impacts would be temporary, and the impact of the project in general on the habitats and species affected would not be significant. See also the response to comment IND6-2.
- IND16-46 See the responses to comments IND6-2 and IND16-45. Section 4.5.2 has been revised to address the issue of unforeseen impacts on trees located along the edge of the construction right-of-way and to include the FERC staff's recommendation that Northwest retain an arborist/forester to inspect trees within 10 days after construction on a property to identify potential safety hazards. Northwest would file a report of the tree safety assessment and a description of any corrective actions implemented with the Secretary no later than 60 days after placing the facilities in service (see also mitigation measure number 19 in section 5.4). Section 4.5.2 also explains how the public can view the report once it is filed.

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- IND16-47 See the response to IND6-5. General impacts on property values associated with the Capacity Replacement Project are discussed in section 4.9.5. A discussion of the alternatives considered for the Capacity Replacement Project is included in section 3.0.

IND16-48 Consider Alternatives

- Based on many of the concerns noted above we ask if you can consider other alternatives to reduce the negative impacts to our community?
- Are there alternatives that are being considered? If so, what are they? Some ideas may include:
 - Considering alternate locations for the new pipe given our highly populated area and the associated risks to having a larger pipe in place.
 - Consider running the 'loop' section in a different area than Sammamish or shortening or eliminating the 'loop' section all together. What about loops in a non-densely populated area?
 - Consider other ways to achieve similar capacity including:
 - Changing the pipe diameter from the proposed size
 - Adjusting the compression
 - Increasing capacity thru current other pipeline
 - Evaluating running a pipe 'inside' the current pipe
 - Placing an internal 'liner', sleeving, or internal sealant inside the current pipeline without removing (this is a similar process to using liquid 'BARS leak' used on automobiles)
 - Could the current 26" pipeline that is now out of service be tested, repaired in limited locations where necessary, and put back in service?
 - If the pipeline must be replaced in this area, can workarounds be done near some trees to maintain them and prevent their removal?
 - Could non-standard parallel offsets be evaluated whereby the pipes are placed closer together than 20' as currently planned?
- Will the other pipeline still in service need replacement sometime in the near future as well? Could capacity/ compression be adjusted to that pipe to meet the needs without the adding other pipe?
- What would be the specific timelines for pipeline removal and replacement? Would these two activities occur at the same time or would the current pipe be removed and several days, weeks, or months later the new pipe be put in place? This really impacts the area safety, home values, ecosystem, etc. How much of the pipe trench area (length of open area) would be dug up at the same time? Would landscaping be removed, the construction project run, and if so, how soon after the project would landscaping be replaced?
- Can the alternatives being considering be detailed and disclosed to the neighborhood and city for review?
- Can all the homeowners in the affected neighborhoods be communicated to regarding this project instead of select homeowner mailings? This would ensure everyone understands the full impact of a project of this magnitude. This is necessary and could help minimize future issues as well. Is there a specific project 'hotline' and website to post comments? Contacts, review schedules and timelines?
- Can you provide information from other similar replacement projects to help us better understand the long term impacts of a project like this?

We want the pipeline to be safe. A project of this size and scope done within the confines of this densely populated, mature Sammamish community needs to be carefully reviewed. Due to the homes being built so close to the pipeline with landscaping and wildlife established, we would ask that alternatives be considered as to whether this is the best and safest way to address the mandated repair. Are there other viable win-win solutions that ensure pipeline safety, home safety, home value, and that minimize impact to environment? Thanks for your attention to this matter.

The word 'Sammamish' is translated from the Indian word 'Samena', meaning hunter. Prior to domestic development of this area Indian tribes gathered at the end of Lake Sammamish and upon the hills of our neighborhood to hunt, fish, gather berries, and enjoy the beauty of this area. Today we can still enjoy some of these same activities given the current landscape. Tomorrow we may not. Removing established trees and other landscaping, scaring off wildlife and thus upsetting our ecosystem Sammamish, Deer Park and nearby communities would be negatively impacted.

Best Regards,

Scott and Michelle Ballantine
23260 NE 20th Place
Sammamish, Washington 98074
425-868-4096
sballan@microsof.com michelle_south@hotmail.com

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IND16-48 Section 3.0 includes a detailed discussion of the alternatives considered for the Capacity Replacement Project. Information on the opportunities provided for public review and comment is presented in section 1.3. See also the responses to comments IND1-5 and IND16-13.

6-385

April 25, 2005

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 Frist Street NE Room 1A
Washington, DC 20426

RE: Docket Number CP05-32

Dear Ms. Salas:

IND17-1 I would like to start out by saying thank you to FERC for holding the last public scoping/EIS meeting in Redmond, WA regarding the potential pipeline replacement project. I would however like to ask some additional questions in regards to the first meeting that was held. It much like the last was an open comment forum; however we still have not received answers to those questions. Could you please explain how these comments at the public meetings are collected and addressed within latest EIS draft? Can you show me where the comments are published and any feedback that was given by FERC?

I would also like express my continued concern and opposition to a portion of the pipeline replacement project. Specifically the part that will directly affect my property in Sammamish, WA FERC refers to it as the Snohomish loop. I live in a subdivision called Deerfield, a highly populated area. From the statistics that I have read there are more children on the Sammamish Plateau than in the entire state of Washington. With that being said here is a list of some of the concerns and questions that I would like FERC to review and address in the Revised Draft. Please clarify where the responses are addressed specifically within the document.

IND17-2 1. Possible Terrorist Attacks - Recently in Sammamish, WA an organization named "ELF" Earth Liberation Front claimed responsibility to setting explosive devices and burning down homes on the Plateau. How will the respond when most of the trees along the greenbelt directly behind my house will get cut down just to replace some pipe? How will FERC and Williams ensure protection against any potential attacks on our homes?

IND17-3 2. Evacuation processes - Where are the specific outlined guidelines for an evacuation plan of the entire neighborhood should any accident happen during the replacement project. When I asked Williams that directly, I was told "oh well you will have to contact the city for that, that is their responsibility". When I contacted the city, I was given a very large book with VERY general guidelines, there is NOTHING specifically written in regards to the pipeline. With 2 elementary schools within a few blocks of the pipeline (one on the corner where the project will start) I would like to know what we as homeowners are suppose to do. This proposed project is scheduled to start while school is still in session in 2006.

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IND17-1 Each public scoping meeting was recorded. The transcripts of the public scoping meetings are available for viewing on the FERC Internet website (<http://www.ferc.gov>). To access the website, use the "eLibrary" link, select "General Search" from the eLibrary menu, and enter the docket number excluding the last three digits in the "Docket Number" field (i.e., PF04-10 and CP05-32). Be sure to select an appropriate date range.

The transcripts from the scoping meetings were reviewed by the FERC staff and each specific comment was assigned to the most appropriate EIS team member to address in the draft EIS. Table 1.3-1 lists the issues that were identified during the scoping process and identifies the section of the EIS where each comment is addressed.

See also the response to comment IND17-1.

IND17-2 See the response to comment IND16-6.

IND17-3 As required in Title 49 CFR Part 192.615, Northwest would prepare an emergency response plan that includes procedures to minimize the hazards in a natural gas pipeline emergency. As part of the plan, Northwest would develop procedures to protect people first, and then property, in the event of an incident. In addition, Northwest would maintain contacts with landowners along its system to remind them of the pipeline and its location and to request notification of any activity along the right-of-way.

- IND17-4 | 3. Project Time Line – When will the homeowners be able to put their fences back up, and rebuild our yards again?
- IND17-5 | 4. What is the recourse homeowners have for unsatisfactory work or damage to homes, yards, trees, decks and grills or patio sets etc. during and after the construction phase of the project?
- IND17-6 | 5. Foundations of the homes – Williams has stated the they would have the foundations checked prior to construction, what happens if something is found wrong, or the home is deemed unlivable (by FERC, Williams or the City) Who will pay to have the homeowners relocated until any damage is repaired?
- IND17-7 | 6. Have Alternatives to the project been considered? Is there another less highly populated area this could be done?
- IND17-8 | 7. The other pipeline that runs parallel with the one that will be replaced. It will be active through out the entire pipeline project and it will be driven over by heavy machinery. Is that really safe?
- IND17-9 | 8. Personal Property within the homes – What happens if items in the home are damaged due to excessive vibration? How will Williams replace those items?

These are just a few of the questions and concerns that I have. Please respond as soon as possible. I hope you will take my concerns into consideration before approving the project.

Sincerely,

Hope Szudzik
Sammamish, WA

Individuals

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- IND17-4 | See the response to comment IND1-5.
- IND17-5 | Section 2.5 describes the environmental compliance inspection and mitigation monitoring program that would be implemented to ensure that activities associated with the Capacity Replacement Project are conducted in compliance with permit requirements and landowner specifications. See also the response to comment IND6-6.
- IND17-6 | See the response to comment IND6-6.
- IND17-7 | Section 3.0 includes a detailed discussion of the alternatives considered for the Capacity Replacement Project, including a discussion of alternative pipeline loop locations (see section 3.2.2.2).
- IND17-8 | Northwest would spread the subsoil excavated from the trench over the working side of the right-of-way where its existing pipelines are located to provide additional protection for the pipelines from the tracking of construction equipment. Northwest has successfully and safely used this technique during construction of other projects (e.g., the Evergreen Expansion Project).
- IND17-9 | See the response to comment IND6-6.

17328 213th Ave. NE
Woodinville, WA 98077
April 25, 2005

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First St., NE, Room 1A
Washington, DC 20426

Ref: Docket Nos. CP05-32-000, -001

Dear Magalie Salas:

I would like to address a few of my concerns in regard to Williams Pipelines' project of removing the old pipes and installing bigger and better pipes on my property at 17328 213th Avenue NE, Woodinville, Washington. My husband, Kim-Fu Lim, has been contacted by the Williams Pipelines representative and he is in communication with the representative John Lopez.

Below is list of our concerns that we would like to be put on record:

- IND18-1 1. My property is surrounded by quite a number of tall trees and the landscaping is such that the pipelines are behind our house and on a higher ground than our house. Removing the tall trees would seriously jeopardize the nice serene nature look of our backyard.
- IND18-2 2. Furthermore, we are concerned about the flow of the underground water. Right now a lot of the water is absorbed by the root system of the trees. Without those trees, our backyard could be flooded.
- IND18-3 3. Another concern is the drain field that is also located behind our house. We do not want the pipeline company to damage our drain pipes.
- IND18-4 4. Heavy equipments that are going to be used are also of concern to us. We are not sure the soil can withstand the heavy equipments and we do not want to have a landslide.

- IND18-5 We understand that Williams Pipelines will make the best effort not to disturb what are in placed. However, great consideration needs to be taken as to how the project will impact the homeowners surrounding the pipelines. What are the ramifications to the homeowners two to five years after the project is completed if the homeowners experience flooding or trees falling due to weakening root system or whatever else that may come as a result of the disturbance from the project. We would like to get the assurance that Williams Pipelines will be there as a good neighbor to assist us through the difficult situations.

Thank you for taking the time to review and address all issues before granting permission for Williams Pipelines to proceed with the project. We hope you will be fair and put the safety and concern of the people and the environment with the highest regards.

Sincerely,
Mr. & Mrs. Kim-Fu Lim

Individuals

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- IND18-1 See the response to comment IND6-5. Section 4.8.6 includes a discussion of impacts on visual resources associated with the Capacity Replacement Project.
- IND18-2 See the response to comment IND6-6.
- IND18-3 Section 4.9.3 has been revised to include additional information on measures Northwest would implement to locate and protect storm sewers and other utilities.
- IND18-4 As discussed in section 4.2.1, Northwest has evaluated existing soil resources along the proposed loops for the limitations related to compaction potential. Section 4.2.3 includes a discussion related to the potential impacts of construction equipment on soils with compaction limitations, as well as a discussion of Northwest's plan to minimize compaction and mitigate compacted soils resulting from pipeline construction. The Woodenville area includes moderate slopes. However, Northwest's geohazards assessment report titled *Capacity Replacement Project Geohazards, Whatcom, Skagit, Snohomish, Pierce, and Thurston Counties, Washington* (Golder, 2004b),⁸ which included landslide hazards designated by King County, did not identify any landslide hazards in the immediate area.
- IND18-5 See the response to comment IND6-6.

⁸ This report is too voluminous to include in this EIS. It is available for public inspection at the FERC's Public Reference Room in Washington, DC (call (202) 502-8317 for instructions) and at the WDOE's regional offices. If you reside in Whatcom, Skagit, Snohomish, or King Counties, you can access this document at the WDOE's Northwest Regional Office in Bellevue by calling the Public Disclosure Coordinator at (425) 649-7190 or (425) 649-7239. If you reside in Pierce, Thurston, Lewis, Cowlitz, or Clark Counties, you can access this document at the WDOE's Southwest Regional Office in Lacey by calling the Public Disclosure Coordinator at (360) 407-6365.